# IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF MISSOURI CENTRAL DIVISION

PARENTS, FAMILIES, AND FRIENDS OF LESBIANS AND GAYS, INC., et al.,	)
Plaintiffs,	) )
v.	) Case No. 2:11-cv-04212-NKL
CAMDENTON R-III SCHOOL DISTRICT, et al.,	) ) )
Defendants.	) )

### <u>DEFENDANTS' MOTION FOR EXTENSION OF TIME TO RESPOND TO</u> PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

COME NOW Defendants, Camdenton R-III School District and Timothy E. Hadfield by and through counsel, and hereby move the Court for an Order extending the time for Defendants to file their Suggestions in Opposition to Plaintiffs' Motion for Preliminary Injunction. In support of said Motion, Defendants state as follows:

- 1. On August 15, 2011, Plaintiffs filed their Complaint for Injunctive Relief, Declaratory Judgment, and Nominal Damages against the Camdenton R-III School District and Timothy E. Hadfield.
- 2. On August 15, 2011, Plaintiffs filed a Motion for Preliminary Injunction and their Suggestions in Support thereof were filed on August 16, 2011.
- 3. Defendants' Suggestions in Opposition to Plaintiffs' Motion for Preliminary Injunction are due on September 1, 2011.
- 4. On the afternoon of August 30, 2011, Plaintiffs filed an Amended Complaint (Document 24) and Motion for Leave to File Supplemental Suggestions in Support of Motion for Preliminary Injunction (Document 28).

- 5. Defendants' Suggestions in Opposition to Plaintiffs' Motion for Leave to File Supplemental Suggestions in Support of their Motion for Preliminary Injunction are due on September 16, 2011.
- 6. In light of the fact that Plaintiffs' filed a Motion for Leave to Supplement their Suggestions in Support of their Motion for Preliminary Injunction, to presumably add new information to reflect the information contained in the Amended Complaint, Defendants hereby request an extension of this Court to respond to Plaintiffs' Motion for Preliminary Injunction until approximately ten (10) days until after Plaintiffs' Motion for Leave to File Supplemental Suggestions in Support of their Motion for Preliminary Injunction is granted or denied by this Court.
- 7. Allowing an extension of time is in the interest of efficiency and justice so that Defendants can respond to the issues which will be before the Court if Plaintiffs' Motion for Leave to file Supplemental Suggestions in Support of their Motion for Preliminary Injunction is granted.
  - 8. Defendants' Motion is not intended for purposes of harassment or delay.

WHEREFORE, Defendants Camdenton R-III School District and Timothy E. Hadfield respectfully request that the Court issue an Order granting the District Defendants an extension of time to file their Suggestions in Opposition to Plaintiffs' Motion for Preliminary Injunction until at least ten (10) days after the Court has ruled on Plaintiffs' Motion for Leave to File Supplemental Suggestions in Support of Motion for Preliminary Injunction in this matter.

#### Respectfully submitted,

## MICKES, GOLDMAN, O'TOOLE, LLC

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ATTORNEYS FOR DEFENDANTS CAMDENTON R-III SCHOOL DISTRICT AND TIMOTHY E. HADFIELD

#### **CERTIFICATE OF SERVICE**

I hereby certify that on the 31st day of August, 2011, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which sent notification of filing to the following:

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